

Message

From: Johnston, John E. [Johnston.John@epa.gov]
Sent: 5/26/2020 5:12:34 PM
To: eric.aufderhaar@ncdenr.gov
CC: Mcdaniel, Robert [robert.mcdaniel@ncdenr.gov]; Woosley, Julie [julie.woosley@ncdenr.gov]; Johnston, John E. [Johnston.John@epa.gov]; Egetter, David [Egetter.David@epa.gov]
Subject: RE: [External] FW: Question about EPA carrying out an RFA
Attachments: Final RFA Cover Letter.pdf

Eric,

EPA does not charge the facility for conducting the RFA or to provide oversight. As for how long it typically takes depends on the availability of the contractor and, now, any travel restrictions imposed by the Covid pandemic. I'm not sure how that is going to work if EPA's contractor conducts the RFA but within the AOC the facility has 90 days to do it. We cannot be held to the 90-day time frame.

You might want to check out Asheville Dyeing and Finishing (NCD 070 619 663). Our contractor did the RFA back in 2005 (I've attached the cover letter). You might want to look at their permit and see what time frame was in it for submitting the RFA (I do not have a copy of the permit).

John

John E. Johnston
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USEPA Region 4 - Atlanta
Tel: 404-562-8458
Fax: 404-562-8439
johnston.john@epa.gov

From: Aufderhaar, Eric B <eric.aufderhaar@ncdenr.gov>
Sent: Tuesday, May 26, 2020 11:51 AM
To: Johnston, John E. <Johnston.John@epa.gov>
Cc: Mcdaniel, Robert <robert.mcdaniel@ncdenr.gov>; Woosley, Julie <julie.woosley@ncdenr.gov>
Subject: RE: [External] FW: Question about EPA carrying out an RFA

Thank you John for your quick response. I copied Julie and Rob to get their input.

Does EPA typically charge the Facility to complete the RFA or provide the oversight? If the contractor conducts the site visit and produces the RFA, how long does it typically take? Within the draft AOC that we are writing now, we are saying 90 days? The plating company is relatively small but they are a LQG and have been in business since at least the early 1970s.

- Eric

From: Johnston, John E. [mailto:Johnston.John@epa.gov]
Sent: Tuesday, May 26, 2020 11:32 AM
To: Aufderhaar, Eric B <eric.aufderhaar@ncdenr.gov>

Cc: Johnston, John E. <Johnston.John@epa.gov>; Egetter, David <Egetter.David@epa.gov>

Subject: RE: [External] FW: Question about EPA carrying out an RFA

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Hi Eric,

Is NCDEQ looking for EPA (or one of our contractors) to conduct and compile the RFA or to conduct an oversight of the facility-produced RFA? In the past NCDEQ has asked the facility to write the RFA and the State, or an EPA contractor, will conduct a facility visit as an oversight to make sure they captured all of the potential SWMUs/AOCs. And there have been times when our contractor has conducted the site visit and written the RFA. Just let us know which route you see this going as that will determine how we proceed with our contractor.

Let me know if you have any questions.

Sincerely,

John

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From: Aufderhaar, Eric B <eric.aufderhaar@ncdenr.gov>

Sent: Tuesday, May 26, 2020 10:44 AM

To: Greaney, Kevin <greaney.kevin@epa.gov>

Cc: Johnston, John E. <Johnston.John@epa.gov>

Subject: RE: [External] FW: Question about EPA carrying out an RFA

Thanks Kevin! After I emailed you last week, some colleagues gave me John Johnston's name and contact information.

I appreciate your help and I hope you have a great week. We are still tele-commuting here but the Department is probably going to start a phased transition to reopening the HQ building next month. The majority of us are in cubicles so it will take some planning.

- Eric

From: Greaney, Kevin [<mailto:greaney.kevin@epa.gov>]

Sent: Tuesday, May 26, 2020 10:31 AM

To: Johnston, John E. <Johnston.John@epa.gov>; Aufderhaar, Eric B <eric.aufderhaar@ncdenr.gov>

Subject: [External] FW: Question about EPA carrying out an RFA

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Hey John,

A NCDEQ Corrective Action person reached out to me regarding assistance on an RFA. Will you please connect with him on providing some assistance on an RFA? See message below for his inquiry.

Eric, John is the North Carolina state coordinator.

Thanks,

Kevin Greaney
404-562-8568

From: Aufderhaar, Eric B <eric.aufderhaar@ncdenr.gov>
Sent: Friday, May 22, 2020 3:14 PM
To: Greaney, Kevin <greaney.kevin@epa.gov>
Subject: Question about EPA carrying out an RFA

Kevin,

We are working with a plating company to develop a new Administrative Order on Consent (AOC) in lieu of a post closure permit. They never had a RCRA Facility Assessment done, and we will be putting that as an early action item in the AOC. My old boss, Bud McCarty, and one of my colleagues has said that EPA (or your subcontractors) sometimes can do them. Who would I talk too to see if that is a possibility?

I hope that you have a great Memorial Day weekend. At 5 PM, North Carolina is going into "Phase 2" so I will be able to get a haircut soon.

- Eric

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